

EXHIBIT H

Has Bola Ahmed Tinubu Committed Perjury? The Evidence Says Yes

Who exactly is the presidential candidate of Nigeria's ruling party? The results of several subpoenas have revealed forged documents, identity theft, false claims and perjury on his INEC Form EC9.



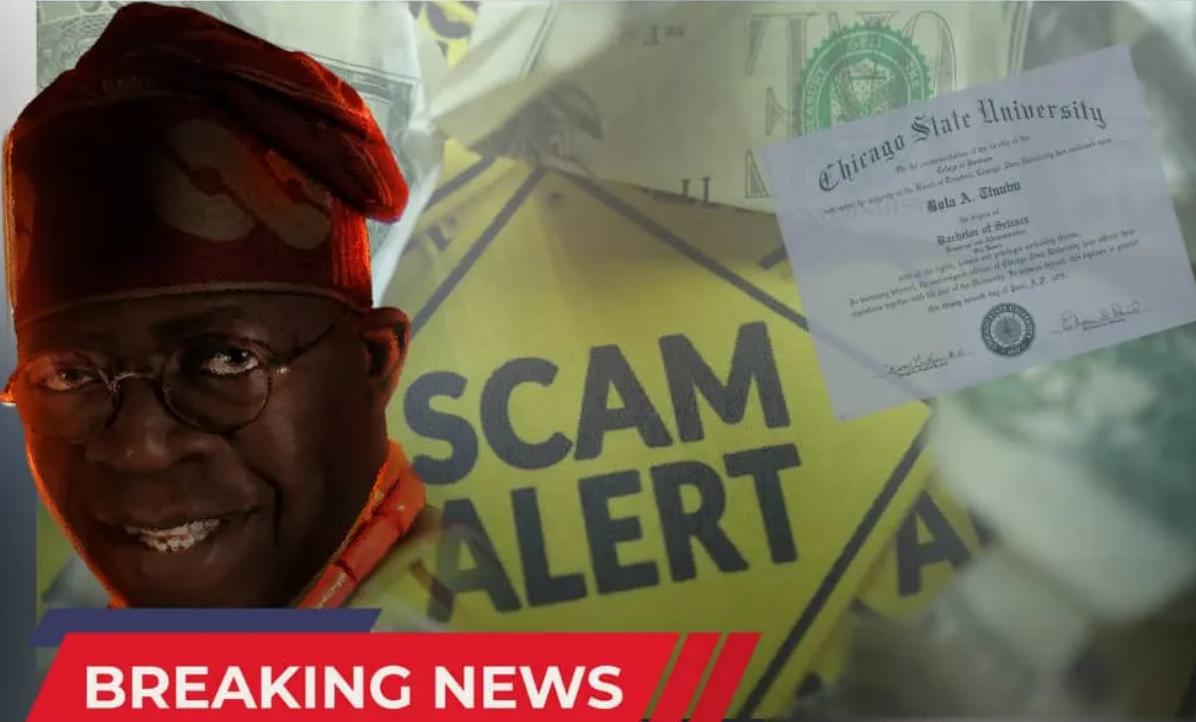
DAVID HUNDEYIN

NOV 16, 2022

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Has Bola Ahmed Tinubu Committed Perjury? The Evidence Says Yes!

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A criminal complaint bordering on issues relating to perjury on Bola Ahmed Tinubu's Independent National Electoral Commission (INEC) Form EC9 has been filed at the Magistrate Court of the FCT sitting at Zone 6 by a lawyer and civil advocate Barrister Mike Enahoro-Ebah. Attached to the request for criminal summons dated Thursday November 10, 2022, is damning evidence of wrongdoing by the APC presidential candidate including document forgery, perjury and potentially even an instance of identity theft.

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It will be recalled that on July 13, 2022, *West Africa Weekly* published a long-read investigative story about the All Progressives Congress (APC) presidential candidate Bola Ahmed Tinubu, and his links to heroin trafficking and money laundering in Chicago during the 1980s and early 1990s. Subsequently on November 13, 2022, *West Africa Weekly* published a documentary based on the story titled ‘Bola Ahmed Tinubu: From Drug Lord to Presidential Candidate.’

Bola Ahmed Tinubu: From Drug Lord to Presidential Candidate



The new revelations are the result of months of collaboration between Barrister Enahoro-Ebah and the Chicago law firm [Leahy, Eisenberg & Fraenkel Ltd.](#) Working on a brief to verify Bola Tinubu’s U.S. academic and employment records as given on his INEC Form EC9 and in several media appearances, [Matthew J. Kowals](#), an Attorney with the above law firm sent out attorney subpoenas to Richard J. Daley College ([formerly known](#) as Southwest College), Chicago State University, Anderson Tax and Deloitte LLP.

What are Subpoenas Used for in Court Normally?

If another party wants to obtain information or documents or get you to testify and secure your testimony, then they may send you a subpoena.

Their attorneys will normally spend a lot of time drafting these documents so that your failure to reply will get you in trouble under the law.

As noted above, the subpoena may come in different forms to the person. It may ask for documents. It may also call the person to be a witness.

Failure to answer in both scenarios, absent a legal excuse, may open that person up to various penalties subject to the law.

Here are some other frequent needs for a subpoena:

- Health information
- Computer files
- Income and employment documentation
- Financial documents like tax returns
- Photos

How subpoenas work

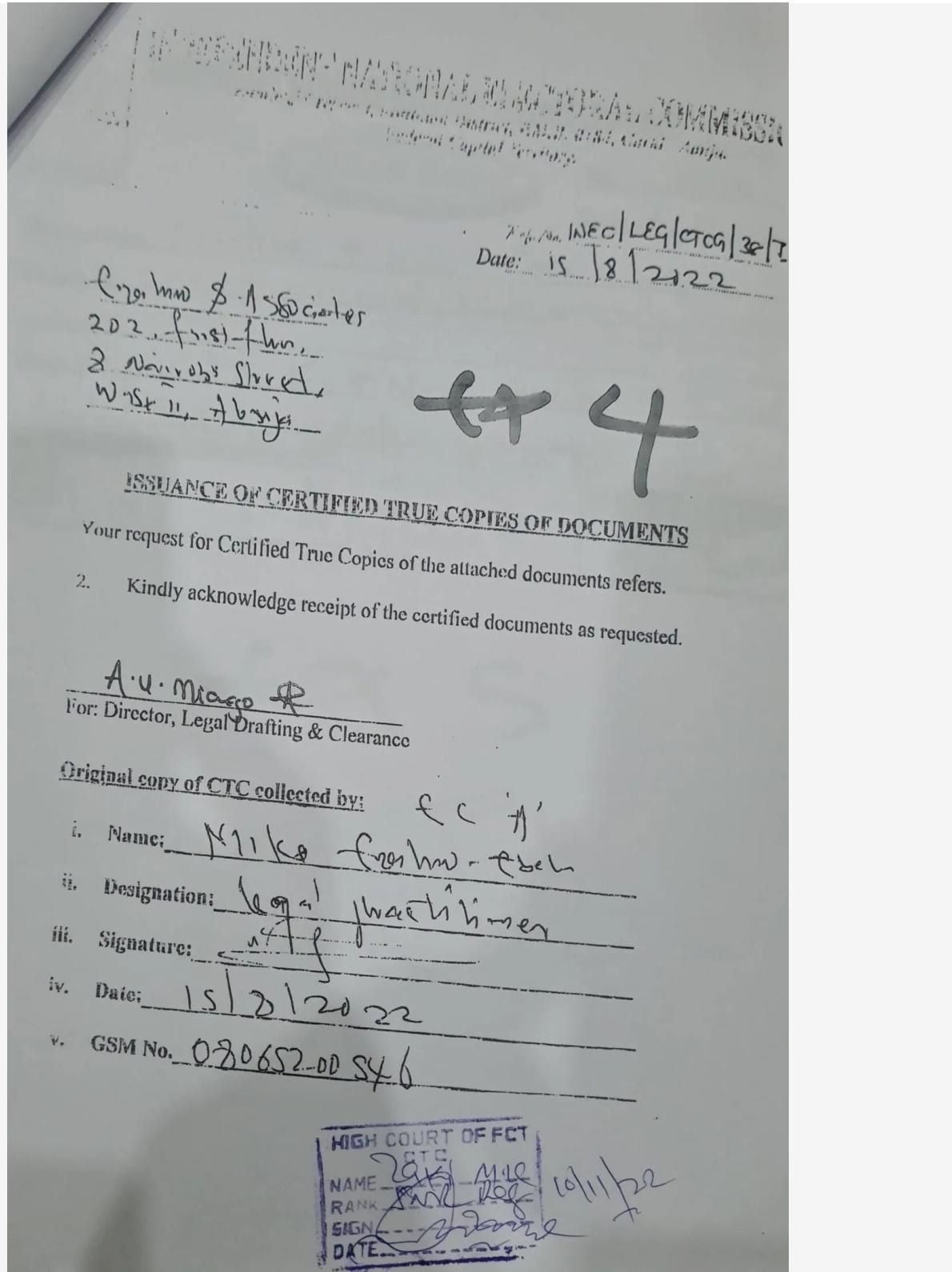
At press time, *West Africa Weekly* was able to get hold of responses to the subpoenas from Richard Daley College, Chicago State University and Deloitte LLP. The documents contained in the responses, which differ sharply from the documents and information submitted to INEC by Tinubu, make up the basis for the legal action filed by Enahoro-Ebah. Among the many discrepancies and omissions as outlined in the action are:

- i. Different dates of birth
- ii. Failure to provide evidence of attendance of a school that appears on his academic record
- iii. Failure to disclose a secondary citizenship
- iv. Forgery of a university degree certificate and

v. A potential instance of identity theft.

The Accusations Laid Out

According to the court documents which are available in full [here](#), Tinubu's INEC Form EC9 (AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS - Particulars of persons seeking elections to the office of President of the Federal Republic of Nigeria), was not made available by INEC to Enahoro-Ebah when he requested for it, despite INEC being legally obligated to make it public. He subsequently filed a lawsuit against INEC (FHC/ABJ/CS/1337/2022), which was resolved in his favour on August 22, 2022.



After beating INEC in court, he engaged Leahy, Eisenberg & Fraenkel Ltd to verify Tinubu's U.S. records as stated on the sworn affidavit. The responses to these subpoenas, which were made available to *West Africa Weekly* shortly after the filing of

the court process, show evidence that the APC presidential candidate committed perjury on his Form EC9, which could be grounds for criminal prosecution.

IN THE CHIEF MAGISTRATE COURT OF THE FCT
IN THE ABUJA MAGISTERIAL DISTRICT
HOLDEN AT ABUJA

BETWEEN:
MIKE ENAHORO-EBAH
AND
BOLA AHMED TINUBU

CASE NO: CR/121/2022

COMPLAINANT

DEFENDANT

BLR/15094

DIRECT CRIMINAL COMPLAINT
(BROUGHT PURSUANT TO SECTIONS 88 (1), 89 (3), 109 (A), 110 (C) AND 115 (1)
(B) AND 119 OF THE ADMINISTRATION OF CRIMINAL JUSTICE ACT, 2015;
AND UNDER THE INHERENT JURISDICTION AND POWERS OF THE HON-
OURABLE COURT SECURED BY SECTION 6(6)(a) OF THE CONSTITUTION OF
THE FEDERAL REPUBLIC OF NIGERIA, 1999 AS AMENDED)

THIS Direct Criminal Complaint is lodged against the Defendant, BOLA AHMED TINUBU of No: 2, Justice Lawal Uwais Street, Beside Lagos State Government Lodge Annex, Asokoro District, Abuja - FCT, as follows:

1. On or about the 17th day of June, 2022, at the Head Quarters of Independent National Electoral Commission (INEC), at Plot 436 Zambezi Crescent, Maitama District, Abuja, within the Jurisdiction of this Honourable Court, the Defendant, BOLA AHMED TINUBU, presented and/or submitted a forged document (Chicago State University Certificate) to the Independent National Electoral Commission (INEC), knowing it to be forged and with intent that it may in anyway be used or acted upon as genuine, thereby committed the offence of Forgery contrary to Sections 362(a), 363 and 364 of the Penal Code Act, Cap. 532, Laws of the Federal Capital Territory, Abuja.

PARTICULARS OF THE COMPLAINT/OFFENCE

1. The Complainant is a Legal Practitioner of over fifteen (15) years standing at the Nigerian Bar, a Human Rights Defender and Public Interest Litigator, who is presently the Managing Principal of Enahoro & Associates, a law firm based in Abuja-FCT.

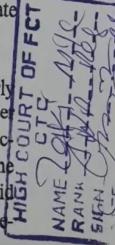
2. The Complainant is a citizen of Nigeria, and who, like every other citizen of Nigeria, has the Constitutional duty to help to enhance the power, prestige and good name of Nigeria and as well as render assistance to appropriate lawful agencies in the maintenance of law and order.

*See 15094
AT 09
15094
15094*

*Fee 7550
15094
15094*

*HIGH COURT OF FCT
NAME: BOLA AHMED TINUBU
RANK: 1
DATE: 10/06/2022*

3. The Complainant, as a Legal Practitioner, is ethically obligated to promote and foster the cause of justice in Nigeria.
4. Premised on the above facts, the Complainant is duty bound to expose the commission of crime(s) by any person, including the Defendant, Public Officials, Agencies or Institutions howsoever described, whose acts could embarrass and dent the prestige and good name of Nigeria.
5. Consequently, the Complainant has brought this Direct Criminal Complaint against the Defendant.
6. The Defendant is the Presidential Candidate of All Progressives Congress (APC) for the 2023 Presidential Election in Nigeria who, on the 17th day of June 2022, in line with the requirement of the Electoral Act, submitted his sworn **FORM EC9 (AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS - Particulars of persons seeking election to the office of President of the Federal Republic of Nigeria)** to Independent National Electoral Commission (INEC).
7. The above information was made public and available to the media on the 17th day of June, 2022, by the Defendant's media office signed by Mr. Tunde Rahman, which informed the Complainant's request to INEC on the 13th day of July, 2022, for the issuance of Certified True Copies (CTC) of the Defendant's Form for Nomination of President - EC13A and EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC for the 2023 Presidential Election in Nigeria slated for the 25th day of February, 2023.
8. The Independent National Electoral Commission (INEC), deliberately refused to issue the Complainant the requested documents as above, which led to filing **SUIT NO:FHC/ABJ/CS/1337/2022; BETWEEN MIKE ENAHORO-EBAH vs. INEC**, at the Federal High Court, Abuja, Court 6, Presided over by *His Lordship, Honourable Justice D. U. Okorwo*.
9. Eventually, on the 15th day of August, 2022, the Independent National Electoral Commission (INEC) issued to the Complainant Certified True Copies (CTC) of the Defendant's Form for Nomination of President - EC13A and EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC by the Defendant, including: National Youth Service Corps Certificate and Chicago State University Certificate.
10. Upon receipt of Defendant's Form for Nomination of President - EC13A, particularly EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC by the Defendant, and upon thorough perusal of the documents particularly the supposed Chicago State University Certificate attached to the Form EC-9, the Complainant consequently caused a request to be made to the said school to obtain all documents and school records pertaining to the Defendant. The re



quest to Chicago State University was made through a Colleague, Matthew J. Kowals of Leahy, Eisenberg & Fraenkel, Ltd, a law firm based in Chicago, United States of America.

11. Matthew J. Kowals, issued an Attorney Subpoena on behalf of the Complainant against Chicago State University in Case/Court No: 22-L-007289, filed on the 12th day of August 2022, headed the Circuit Court of Cook County, Illinois, directing the University to mail to Counsel all documents and school records pertaining to the Defendant in their possession and custody.

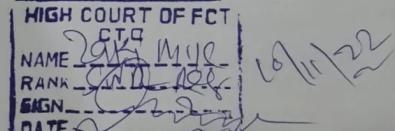
12. In compliance with the Subpoena issued, Chicago State University wrote a letter dated the 22nd day of September 2022, addressed to Matthew J. Kowals, and enclosed therein "all the records" the school have pertaining to the Defendant. The Records/Documents released include:

- I. Copy of Chicago State University Certificate,
- II. Copy of Academic Records,
- III. Copy of Undergraduate Admission Application Form,
- IV. Copy of University of Cambridge General Certificate of Education,
- V. Copy of Southwest College Transcript (Now City College of Chicago).

13. Curiously, the information contained in the documents and school records received from Chicago State University contradict material information provided by the Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and documents attached thereto, submitted to INEC.

14. The following are some of the information found in the documents and school records obtained from Chicago State University pertaining to the Defendant which contradict material depositions contained in Defendant's sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC:

- I. The Bola Tinubu that attended Chicago State University was born in 1954 and not 1952 as claimed by the Defendant on oath in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC.
- II. The Tinubu that attended Chicago State University indicated in his Undergraduate Admission Application Form that he is an American Citizen (Black American) while the Defendant, in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC at paragraphs 9, 10, 11, 12 indicated that he was a Nigerian citizen only and has never acquired the citizenship of another Country or pledged allegiance to any other country.



III. The Tinubu that attended Chicago State University indicated in his Undergraduate Admission Application Form that he graduated from Government College, Lagos, in 1970, while the Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC provided no information as to his attendance of the said Government College Lagos.

IV. In support of the Defendant's Undergraduate Admission Application Form submitted to Chicago State University in 1977, was a transcript from Southwest College, Chicago, bearing the name "TINUBU BOLA A." which belonged to a "FEMALE". The Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC indicated that he is a MAN.

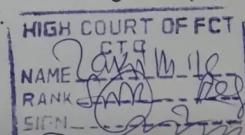
15. Most importantly, the copy of the Chicago State University Certificate belonging to Bola A. Tinubu released pursuant to the said Subpoena served on Chicago State University, is radically different from the copy attached to the Defendant's sworn **Form EC-9 - AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS**, submitted to INEC on the 17th day of June, 2022.

16. A direct comparison of both Certificates reveal the following:

- I. Different dates of issue by the University (22nd day of June 1979 and 27th day of June 1979),
- II. Different University logo on both Certificates,
- III. Different sentences and/or grammatical construction on faces of Certificates,
- IV. Different signatures for Chairman, Board of Trustees, on both Certificates,
- V. Different signatures for President of the University, on both Certificates,
- VI. Different font type used in the writing of both Certificates,
- VII. The copy of the Certificate obtained from Chicago State University, contain only two (2) signatures belonging to the Chairman, Board of Trustees and President of the University. No other party signed, unlike the one submitted to INEC by the Defendant which was signed by a third person.

17. Based on the obvious contradictions, the Complainant verily believes that the Defendant submitted a forged Chicago State University Certificate dated 22nd June 1979 to INEC with the intention of causing INEC to believe that said certificate was genuine for the purpose of qualification for election to the office of President.

18. The Complainant, as a citizen of Nigeria, saddled with the Constitutional duty to help to enhance the power, prestige and good name of Nigeria and as well as render assistance to appropriate lawful agencies in the maintenance of law and order, has now lodged this Direct Criminal Complaint alleging **Forgery** against the Defendant.



19. It is in the best interest of Nigeria, justice and equity to issue Criminal summons to ensure the Defendant's attendance to answer to this Complaint.

20. The Complainant verily believes that the Defendant who is within the Jurisdiction and District of the Federal Capital Territory, Abuja, is likely to leave the jurisdiction and district within the next Forty-Eight (48) Hours if not summoned by the Honourable Court to appear immediately.

21. The Honourable Court has the statutory and inherent powers to direct that the Defendant be brought to answer to this Complaint.

22. This Direct Criminal Complaint is made in good faith and in the interest of justice.

Dated this 9th day of November, 2022

and in the interest of justice.

Mike Enahoro-Ebah, Esq.

ENAHORO & ASSOCIATES

Suite 202, First floor, Fortune Plaza,

Aminu Kano Crescent,

Wuse II, Abuja, FCT.

Tel: +2348065200546,

nikeebah@nigerianbar.ng;



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Further, Enahoro-Ebah says that when the discrepancies between the documents subpoenaed from Chicago State University and the documents submitted to INEC were pointed out to the university, a lawyer in the United States suspected to be working for Tinubu, contacted Leahy, Eisenberg & Fraenkel Ltd, asking them to “destroy” the documents.

Speaking exclusively to *West Africa Weekly*, Enahoro-Ebah said:

"Chicago State University was cooperative until we sent them the INEC copy of the certificate pointing out the differences and asking them if they issued this. Next thing we knew, an outside counsel contacted our lawyer asking that we "destroy" all documents because he made a technical error in the subpoena or something silly like that. So he [Tinubu] is currently fighting back from the US."

True or False? Examining The Evidence

While it is not listed on his INEC EC9 affidavit, Tinubu has repeatedly [claimed](#) that he was recruited by global consulting firm Deloitte immediately after graduating from university in 1979. There, as an entry-level consultant fresh out of university between 1979 and 1983, he allegedly saved up the sum of \$1,800,000 from salary and bonus payments alone.



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My education, career at Deloitte, Mobil, others – Tinubu

How did you get into Mobil?

At Deloitte and Touche, I chose to travel more than 80 per cent of my working years there. And that is because if staff chose to travel, he would make more money. After all, he would get travel allowances. That got me into National Oil, which became the Joint Venture Partner of Aramco Oil in Saudi Arabia, which is like the Nigerian National Petroleum Corporation. We had gone there to set up their accounting and auditing system. It was while on that service that I got my financial break. When I returned to the United States, my employers gave me a huge bonus, which instantly turned me into a millionaire.

How much was that?

The bonus was \$850,000, before taxes. My salaries were also being paid into the bank and I was not touching them. At the time, my salary deposits in the bank had risen to about \$1.8 million.

To verify whether this actually happened, Leahy, Eisenberg & Fraenkel Ltd issued a subpoena to Deloitte LLP on September 16, 2022, requesting all information held on file about Bola Ahmed Tinubu.

Subpoena in a Civil Matter (For Testimony and/or Documents) **(12/01/20) CCG 0106 A**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Mike Enahoro Ebah, et al <hr/> v. University of Chicago et al	Plaintiff/Petitioner <hr/> Defendant/Respondent
Case No. <u>22-L-007289</u>	

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: Deloitte, LLP
111 S. Wacker Drive, Ste. 1800
Chicago, IL 60606

1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____ in Room _____, _____, Illinois on _____
at _____ AM PM

2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public
at: _____ in Room _____, _____, Illinois on _____
at _____ AM PM

3. YOU ARE COMMANDED to mail the following documents in your possession or control to Leahy, Eisenberg & Fraenkel at 33 W. Monroe, Ste. 1100, Chicago, IL 60603, on or before 10/16/22 at 5:00 AM PM
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES):
See attached rider.

Description continued on attached page(s).

Your failure to respond to this subpoena will subject you to punishment for contempt of this Court.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org
Page 1 of 2

Subpoena in a Civil Matter (For Testimony and/or Documents) (12/01/20) CCG 0106 B

Notice to Deponent:

1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows:

Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____.

(Name of Recording Device Operator)

3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No: _____
 Pro Se 99500

Name: Leahy, Eisenberg & Fraenkel Ltd

Atty. for (if applicable): _____

Issued by: /s/ Matthew J. Kowals

Signature

Petitioners _____

Attorney Clerk of Court

Address: 33 W. Monroe, Ste 1100

Date: 9/16/22

City: Chicago

State: IL Zip: 60603

Telephone: 312 368 4554

Primary Email: mjk@lefltd.com

I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2), to _____ by certified mail, return receipt requested

(Receipt # _____) on _____. I paid the witness \$ _____ for witness and mileage fees.

I served this subpoena by handing a copy to Behler, LLP & Law Pitlik

on 9/19/2022. I paid the witness \$ 30.00 for witness and mileage fees.

/s/

Paulo C. Caylor
 (Signature of Server)

James W. Cantino
 (Print Name)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
 cookcountyclerkofcourt.org

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SUBPOENA RIDER

Any and all records including but not limited to application for employment, resume, correspondence, personnel file, records relating to any submitted accreditation to practice as an accountant or in any other professional capacity requiring licensure, Accounting Exam, CPA Results, CPA Certifications, test results and any other records in your possession or control relating to Bola Ahmed Tinubu, date of birth alleged to be 3/29/1952, Social Security No. 321-06-0595 or 213-06-0595 or 231-06-0595.

The response, which came on September 20, 2022, was direct and unequivocal.



Deloitte LLP
30 Rockefeller Plaza
New York, NY 10112-0015
USA
www.deloitte.com

September 20, 2022

Leahy, Eisenberg & Fraenkel Ltd.
ATTN: Matthew J. Kowals
33 W. Monroe, Ste. 1100
Chicago, IL 60603

Dear Mr. Kowals:

We received a subpoena dated September 16, 2022 seeking employment records for Bola Ahmed Tinubu, SSN ***-**-0595, DOB 03/29/19**. Please be advised that we have no record of Bola Ahmed Tinubu in our systems, and as such have no employment records for them.

Sincerely,

Tish Negron

Tish Negron
Senior Legal Specialist

On his INEC Form EC9, Tinubu provided no details of his primary and secondary education, even filling in the relevant years as "0000". Exactly why INEC permitted this clear violation remains unclear, but it could perhaps go some way to explaining the Commission's reluctance to release certified true copies of the EC9 to the public.

EC

SCHOOLS ATTENDED / EDUCATIONAL QUALIFICATIONS WITH DATES
(Attach evidence of all educational qualifications)

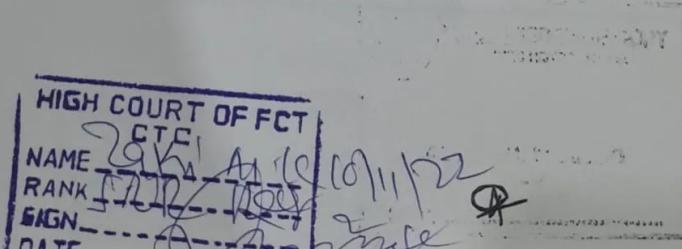
SN	SCHOOL	QUALIFICATION	YEAR
1	PRIMARY		0000
2	SECONDARY		0000
3	HIGHER	BSC BUSINESS AND ADMINISTRATION	1979

D (i). WORKING EXPERIENCE WITH DATES

NAME OF EMPLOYER	PERIOD OF WORK	REASON FOR LEAVING (PLEASE ATTACH EVIDENCE)
MOBIL OIL NIG PLS	1983-1992	POLITICS
NATIONAL ASSEMBLY (SEN)	1993	MILITARY INTERVENTION
LAGOS STATE (GOVERNOR)	1999-2007	END OF TWO TENURES

ii. Have you ever been dismissed from the Public Service of the Federation, State or Local Government / Area Council? If Yes, give details.

YES NO



To gain some clarity over Tinubu's educational background, another subpoena went out to Chicago State University, where Tinubu claims to have obtained a degree in Business and Administration in 1979.

Division Initial Case Management Dates will be heard via ZOOM.
For more information and Zoom Meeting IDs go to https://www.cookcountycourt.org/HOME/Zoom-Links/Agg4906_SelectTab/12
Note Court date: No hearing information was found.

FILED
8/12/2022 2:17 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2022L007289
Calendar, B
19088898

Subpoena in a Civil Matter (For Testimony and/or Documents) (12/01/20) CCG 0106 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Plaintiff/Petitioner Mike Enahoro Ebah, et al v. University of Chicago et al	Case No. <u>2022L007289</u> Defendant/Respondent
---------------------------------------------------------------------------------------	-----------------------------------------------------

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: Chicago State University
9501 S. King Dr., Cook Admin Room 128
Chicago, IL, 60628

1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____ in Room _____, _____, Illinois on _____
at _____ AM PM

2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at: _____ in Room _____, _____, Illinois on _____
at _____ AM PM

3. YOU ARE COMMANDED to mail the following documents in your possession or control to Leahy, Eisenberg & Fraenkel at 33 W. Monroe, Ste. 1100, Chicago, IL 60603
on or before 9/11/22 at 5:00 AM • PM
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES).
See attached rider.

Description continued on attached page(s).
Your failure to respond to this subpoena will subject you to punishment for contempt of this Court.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org
Page 1 of 2

HIGH COURT OF FCT	EXHIBIT
NAME <u>SAF</u>	RANK <u>SAF</u>
SIGN <u>SAF</u>	DATE <u>8/11/22</u>

FILED DATE: 01/10/2022 2:17 PM 2022L007289

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 B

Notice to Deponent:

1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows:

1. Description continued on attached page(s).
(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)

3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No.: _____
Pro Se 99500

Name: Leahy, Eisenberg & Fraenkel Ltd
Atty. for (if applicable): _____
Petitioners

Address: 33 W. Monroe, Ste 1100
City: Chicago
State: IL Zip: 60603
Telephone: 312.368.4554
Primary Email: mjk@lefllc.com

Issued by: /s/ Matthew J. Kowals Signature _____
Attorney _____ Clerk of Court _____

Date: 8/11/22

I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2), to _____ by certified mail, return receipt requested
(Receipt # _____) on _____. I paid the witness \$ _____ for witness and mileage fees.

I served this subpoena by handing a copy to Beth Westberg on 8/18/2022. I paid the witness \$ 25.00 for witness and mileage fees.

/s/ Iris Y. Martinez (Signature of Server) James W. Guttman (Print Name)

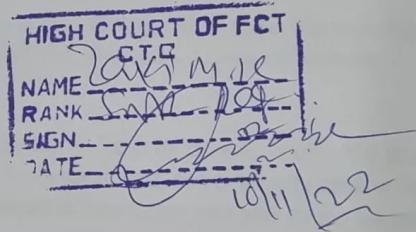
Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookecountyclerkofcourt.org
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10/11/22

HIGH COURT OF FCT	
CTC	
NAME	<u>J. A. Guttman</u>
RANK	<u>M. 10</u>
SIGN	<u>2022</u>
DATE	<u>10/11/22</u>

SUBPOENA RIDER

Any and all records pertaining to the admission of Bola Ahmed Tinubu, date of birth alleged to be 03/29/1952, Social Security No. 321-06-0595 or 213-06-0595, as a student Chicago State University, including but not limited to his application for admittance at the University and all documents submitted to the University for consideration of his admittance; any and all records pertaining to the acceptance by Chicago State University of Bola Ahmed Tinubu as a student at the University, including but not limited to any correspondence or documentation evidencing his admittance as a student to the Chicago State University; any and all documents pertaining to any degrees attained by Bola Ahmed Tinubu from the Chicago State University or issued by the Chicago State University; and, in general, any documentation tending to prove that Bola Ahmed Tinubu was admitted as a student at the Chicago State University and attended school at Chicago State University as a student of the university, and/or any document evidencing that Bola Ahmed Tinubu did not attend, and/or was not admitted to, Chicago State University.



The documents that came back make up the bulk of what underpins Enahoro-Ebah's criminal complaint against Bola Tinubu. First of all, on his EC9, Tinubu gave his date of birth as March 29, 1952.

Affidavit in support of particulars of persons seeking Election to the office of the President, Vice President, Governor, Deputy Governor, Senate, House of Representatives, State House of Assembly, Chairman, Vice Chairman or Councillor of Area Council.

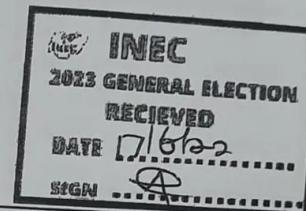
I, TINUBU BOLA AHMED, hereby make oath and declare that I am the person seeking election into the office of Presidential in the Nigeria Constituency and the particulars given hereunder are correct, true and to the best of my knowledge.



PART A

Office Contested For:

Presidential



Name of Constituency:

Nigeria

Code: PR/01

Name of Political Party:

All Progressive Congress

Party Membership Number:

LA/
KJA/11/00001

(Please attach a copy of party membership card)

PART B

A PERSONAL PARTICULARS

1. Surname (In Block Letters):

TINUBU

2. Other names (in Block Letters):

BOLA AHMED

3. Former name(s):

4. Date of Birth: 1952-03-29

Age: 70

Birthplace: LAGOS

(Candidate shall comply with the statutory age required for the elective office sought)

Residential Address: 10 SUNDAY ADIGUN STREET IKEJA LGA LAGOS STATE

Occupation:

POLITICIAN

Telephone No:

08027770001

Email: jagaban1952@gmail.com



Are you a person with disability?

Type your email...

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On Chicago State University's records however, "Bola A. Tinubu" has a different date of birth - March 29, 1954.

T 4 9

Chicago State University—Academic Record

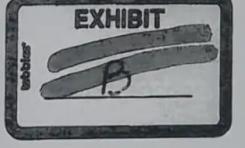


OFFICE OF THE REGISTRAR
85TH ST. AT KING DRIVE
CHICAGO, ILLINOIS 60625-1690
BOLA A YINUBU
205
7424 SOUTH SHORE DR
CHICAGO IL 60669

9900 231-06-0595

DATE OF BIRTH - 03/29/54 (circled)
ILL ST & US CONSTITUTION
REQUIREMENT MET: YES

PAGE 1 01/30/97

COURSE/NUMBER		COURSE TITLE		CR. HRS.	GRADE	COURSE/NUMBER		COURSE TITLE		CR. HRS.	GRADE
TOT EARN CR ACC 027.00 SH		FALL 77				TOT EARN CR ACC 027.00 SH		FALL '78			
TERM EARNED	27.00	GDPT	0.0	GPA	0.00	ECON	206	PRICE & ALLOC THEORY	3	B	
CSU EARNED	0.00	GDPT	0.0	GPA	0.00	ENG	127	COMPOSITION I	3	C	
CUM EARNED	27.00	GDPT	0.0	GPA	0.00	MATH	214	INTRO TO FINITE MATH	3	B	
SOUTHWEST 76-77 027.00 SH						ACCT	316	ACC STANDARD AC/PROF	3	C	
						ACCT	317	AUDITING	3	W	
						MGMT	209	SMALL BUS MGMT	3	A	
						TERM EARNED	15.00	GDPT 42.0	GPA	2.80	
						CSU EARNED	66.00	GDPT 231.0	GPA	3.50	
						CUM EARNED	93.00	GDPT 231.0	GPA	3.50	
						WINTER 79					
						ECON	230	QUAN ANALYS BUS/EC	3	A	
						ENG	128	COMPOSITION II	3	B	
						ACCT	293	FEDERAL INCOME TAX	3	A	
						ACCT	317	AUDITING	3	A	
						ACCT	325	INT AUDITING	3	A	
						INSY	226	DECISION ANAL	3	A	
						TERM EARNED	18.00	GDPT 59.0	GPA	3.83	
						CSU EARNED	84.00	GDPT 300.0	GPA	3.57	
						CUM EARNED	111.00	GDPT 300.0	GPA	3.57	
						SPRING 79					
						ENG	279	BUSINESS WRITING	3	B	
						MATH	209	BASIC CALCULUS	3	B	
						POL	321	PRIIN PUBLIC ADMIN	3	B	
						ACCT	394	ADV FED INCOME TAX	3	W	
						PE	117	TEENNIS	1	W	
						TERM EARNED	9.00	GDPT 27.0	GPA	3.00	
						CSU EARNED	93.00	GDPT 327.0	GPA	3.52	
						CUM EARNED	120.00	GDPT 327.0	GPA	3.52	
						DEGREE REQUIREMENTS COMPLETED WITH HONORS					
						DATE: JUNE 22 1979 DEGREE: BACH OF SCI IN BUS&ADM MAJOR: ACCOUNTING CURRICULUM: BUSINESS & ADMIN					
						 EXHIBIT B					
<small>1. In accordance with the Family Educational Rights and Privacy Act of 1974, information from this transcript may not be released to a third party without written consent of the student.</small>											
<small>CHICAGO STATE UNIVERSITY THIS RECORD IS NOT OFFICIAL UNLESS IT BEARS A SIGNATURE AND SEAL OF THE UNIVERSITY</small>											
<small>Explanatory legend and authenticity confirmation information on back.</small>											
<small>HIGH COURT OF ECT</small>											
<small>NAME: <u>Debra M. LS</u> CTC 10/11/22 RANK: <u>SGT</u> REG SIGN: <u>LS</u> DATE: <u>10/11/22</u></small>											

As mentioned above, Tinubu's EC9 contained no details of any secondary school attended in Nigeria. On it, he also affirmed that he has no nationality other than Nigeria.

Nationality:

NIGERIA

EC

10. Have you voluntarily in the past changed Nationality? YES NO

If Yes, what was your former Nationality?

11. Have you voluntarily acquired citizenship of any other country? If Yes, which country?

YES NO

12. Have you made a declaration of allegiance to that or any other country? If Yes, specify the country.

YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
INEC	
2023 GENERAL ELECTION	
RECEIVED	
DATE 17/8/23	
SIGN 	

(Attach evidence)

HIGH COURT OF FCT

NAME	265	WIC
RANK	SAC	REG
SIGN	2023	
DATE	17/8/23	

RECEIVED 17/8/23
HIGH COURT OF FCT
WIC REG
2023

On Chicago State University's admission records however, he claimed to have attended Government College, Lagos. He also claimed to be "Black American."

High School graduated (will graduate) from
 (A370) **GVERN. COLLEGE, LAGOS, NIGERIA**

State **ILLINOIS** Graduation Date (use numbers)
 (A380) **05 20**

City in Town
 (A140) **CHICAGO, ILLINOIS**

Dates of Attendance (use numbers)
 Month Year Month Year
 (A141) **09 68 05 70**

Diploma conferred
 (A142) **001/649**

CERTIFICATION
 This certification must be signed and dated before action can be taken on this application. I understand that withholding information requested on this application or giving false information may make me ineligible for admission to the University or subject to dismissal. I certify that the statements I have made on this application are correct and complete.

Signed **John J. Lee** Date **05/20/70**

Your response to the following is voluntary. The information is requested so that the University can demonstrate its compliance with Federal Regulations.
 (CHECK ONE BOX)

American Indian or Alaskan Native Black American Jurisdiction American
 Spanish Surnamed American Other Explain

64069
 Receipt No. **CSU**
 CHICAGO STATE UNIVERSITY
 All 6 0 9 107
 PAID **15**
 Recd. By **John J. Lee** Total Amt. **15**

HIGH COURT OF FCT CTC
 NAME **John J. Lee** RANK **100** SIGN **100**
 DATE **10/11/22**

The trouble is that Government College Lagos was founded in 1974, as evidenced by the sign below which can still be viewed at the school premises. No such school existed in 1970.

The second point is important because there is a certain amount of ambiguity regarding whether [Section 137](#) of the 1999 constitution precludes certain public office holders including the president, state governors and members of the Senate and Federal House of Representatives from holding dual citizenship. What is known for a fact in any case, is that if Tinubu was indeed “Black American,” i.e. in possession of U.S. citizenship, that would mean that he committed perjury by failing to declare it on his EC9.

• Eligibility for head of state

137

1. A person shall not be qualified for election to the office of President if-

- a. subject to the provisions of section 28 of this Constitution, he has voluntarily acquired the citizenship of a country other than Nigeria or, except in such cases as may be prescribed by the National Assembly, he has made a declaration of allegiance to such other country; or
- b. he has been elected to such office at any two previous elections; or
- c. under the law in any part of Nigeria, he is adjudged to be a lunatic or otherwise declared to be of unsound mind; or

Nigeria 1999 (rev. 2011)

Page 48

As bad as the above infractions look, they pale into insignificance compared to those that come next. For reference, as mentioned in *West Africa Weekly*'s July exposé, there has been persistent controversy over Tinubu's true identity prior to his arrival in the US. His refusal to include details about his Nigerian education on the EC9 affidavit has not helped to dispel persistent rumours that "Bola Ahmed Tinubu" could in fact, be an assumed identity.

This is worsened by what is revealed on the following document included in Chicago State University's responses to the subpoena. The document is an academic transcript for "Bola A. Tinubu" from Southwest College ([later renamed](#) Richard J. Daley College), which was used to process his admission into the university. On it, the sex of "Bola A. Tinubu" is clearly marked "F."

Since US law in the 1970s only permitted individuals to legally reclassify their gender after gender reassignment surgery ([M.T. v J.T. 1976](#)), it is safe to preclude the possibility that the person now known as “Bola Ahmed Tinubu” once identified as a woman. This raises all sorts of questions about who exactly the APC presidential candidate is, including the alarming question of potential identity theft, criminal impersonation and fraud.

Even more curiously, as stated by CSU, there are no records for Tinubu on file that contain clear information about who exactly “Bola A. Tinubu” was. No passport, no visa, no social security card, and no driver’s licence.

← X 7



CHICAGO STATE
UNIVERSITY

September 22, 2022

To Matthew J. Kowals:

Please be advised that Bola A. Tinubu attended Chicago State University from August 1977 - June 1979. He was awarded a Bachelor of Science degree in Business Administration with Honors on June 22, 1979.

The enclosed documentation is all the records we have for Bola A. Tinubu. We do not have a record of any documentation for a: passport, visa, social security card, or driver's license. Additionally, we do not have a record of how tuition was paid during his time of attendance.

Respectfully,

Caleb Westberg

Caleb Westberg
Registrar
Office of Records and Registration
9501 South King Drive - ADM 128
Chicago, IL 60628
773-995-2517 (phone)
773-995-3618 (fax)
CSU-Registrar@csu.edu

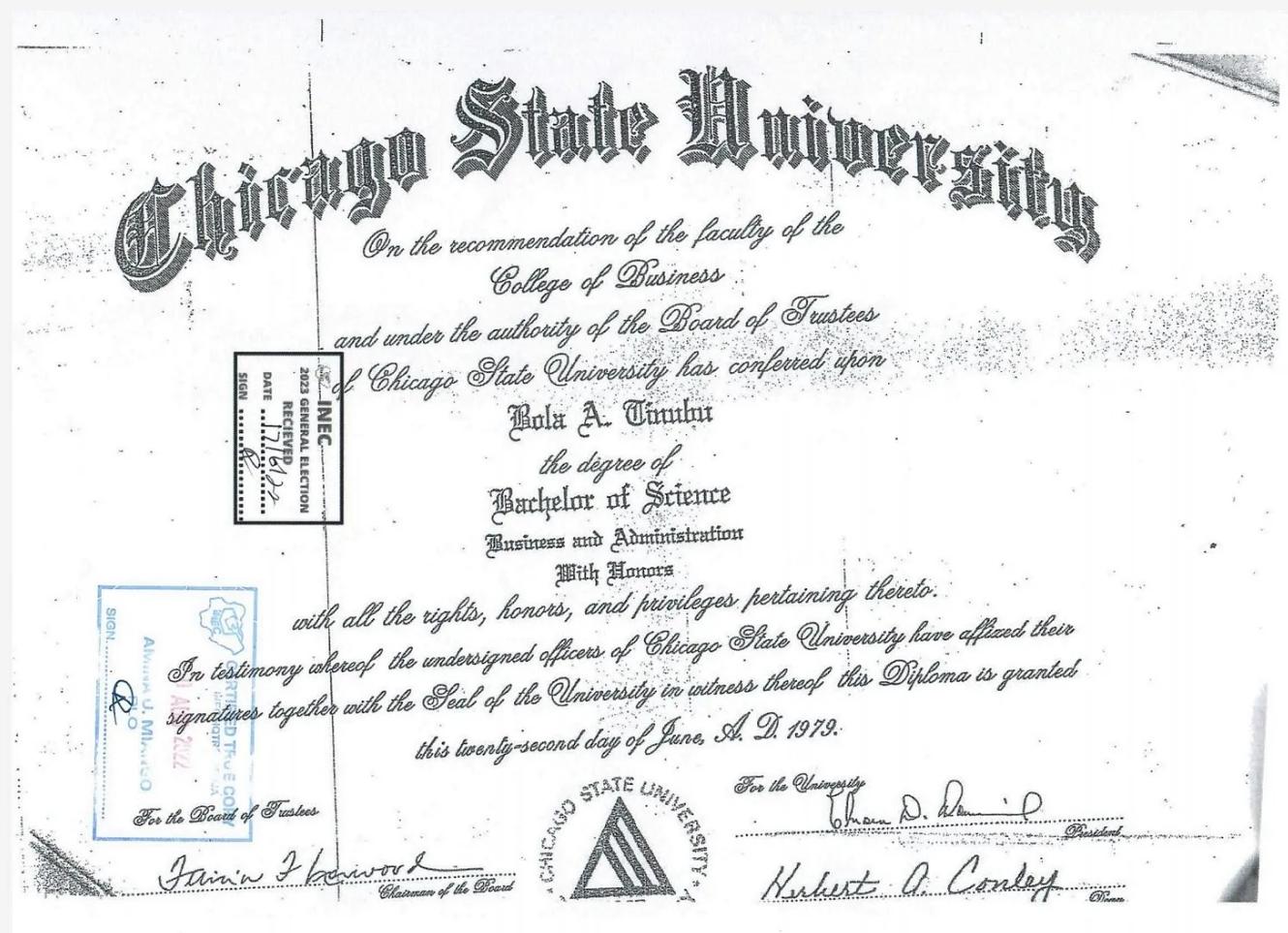
9501 S. King Drive
Chicago, IL 60628
773.995.2000

HIGH COURT OF FCT	
CTQ	
NAME	T. A. M. S.
RANK	S. D. C. 100
SIGN	10/11/22
DATE	

csu.edu

Still it gets even worse.

The following document was submitted to INEC alongside the EC9 affidavit as proof of Bola Tinubu's degree at Chicago State University.



In response to the subpoena, Chicago State University reproduced and sent in the exact degree certificate that was awarded to him in 1979. That certificate can be seen below. Evidently, both certificates are completely different.

Chicago State University

On the recommendation of the faculty of the
College of Business
and under the authority of the Board of Trustees, Chicago State University has conferred upon

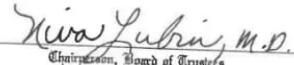
Bola A. Tinubu

the degree of

Bachelor of Science
Business and Administration
With Honors

with all the rights, honors and privileges pertaining thereto.

In testimony whereof, the undersigned officers of Chicago State University have affixed their signatures together with the seal of the University. In witness thereof, this diploma is granted
this twenty-seventh day of June, A.D. 1979.


Kira Lubin, M.D.

Chairperson, Board of Trustees




Eugene D. Daniel

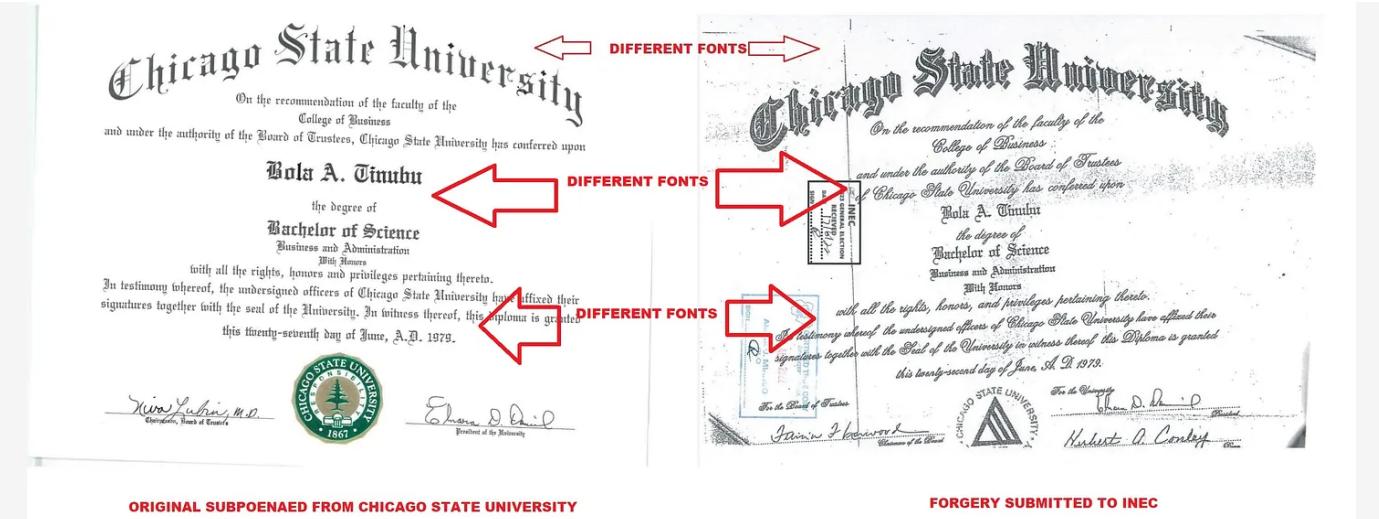
President of the University

A line-by-line analysis of the original certificate versus what Tinubu submitted to INEC reveals the following glaring discrepancies. First of all, both certificates are written in completely different font types. It is important to note that the certificate provided by CSU in response to the subpoena is an *exact* reprint of the original certificate issued in 1979.

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This means that any other certificate purporting to be the same one with even the slightest deviation in style, format or content, can only be a fake.

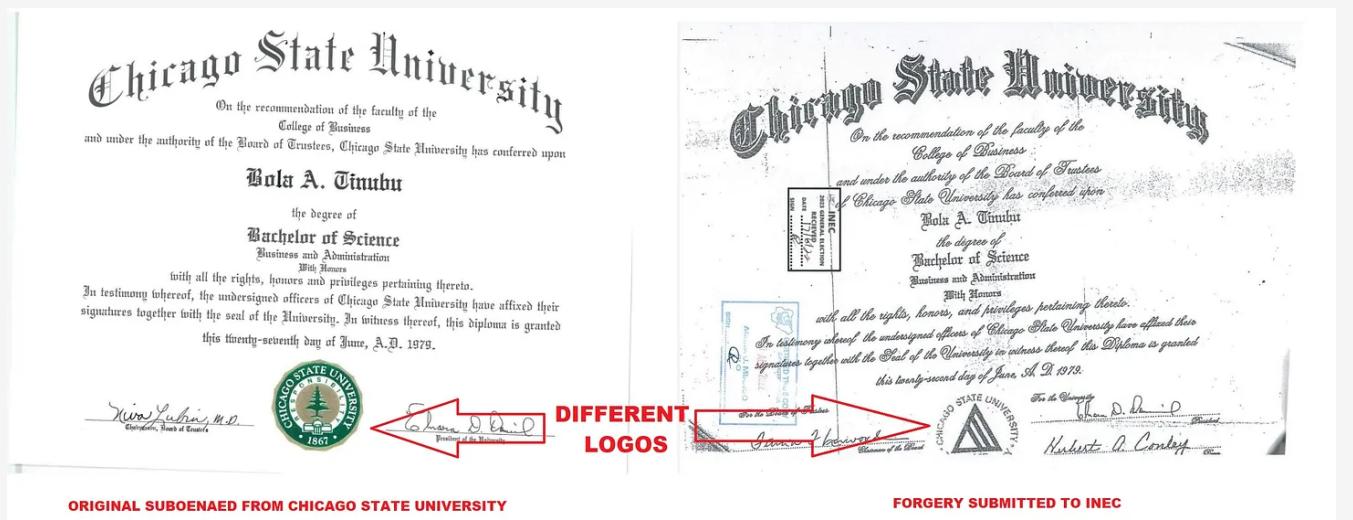


Next, the certificate submitted to INEC has 2 grammatical errors on it. It says: “On the recommendation of the faculty of the college of business, and under the authority of the board of trustees of Chicago state university has conferred upon...” This is a meaningless and incomplete statement. What the original document provided by CSU actually says is “On the recommendation of the faculty of the college of business and under the authority of the board of trustees, Chicago State University has conferred upon...” That is a grammatically correct statement with meaningful sentence construction.

The certificate submitted to INEC then says “In testimony thereof, the undersigned officers of Chicago State University have affixed their Signatures together with the seal of the University in witness thereof this Diploma is granted this twenty-second day of June A.D. 1979.” This is another meaningless and incorrect statement. What it should say, per the original on the left is “In testimony thereof, the undersigned officers of Chicago State University have affixed their Signatures together with the seal of the University. In witness thereof, this Diploma is granted this twenty-seventh day of June A.D. 1979.”



Both documents also have clearly different logos on them. Once again bear in mind that the certificate obtained from CSU via subpoena is an *exact reprint of the original issued certificate*. This means that the logo on the left *must* appear in Tinubu's certificate even if Chicago State University has changed logos 75 times since 1979.



In any case, Chicago State University's only other known logos since then can be found below. Where exactly the logo on Tinubu's certificate originates from is anyone's guess.



And then there is the layout of both certificates. At risk of excessive repetition, it must be noted once again that the certificate on the left is an *exact replica* of the certificate issued by Chicago State University in June 1979. Any deviation from what is on it can mean only one thing - forgery.



Finally there, is the crowning touch that proves without a doubt that Bola Tinubu submitted a forged certificate to INEC - the date on his purported certificate is different to that on the reprinted certificate obtained via subpoena from Chicago State University. Whereas the original on the left states that the degree was awarded on June 27, 1979, the certificate Tinubu submitted to INEC states that the degree was awarded on June 22, 1979. All of this points to one clear conclusion - the “certificate” on the right is a forgery.



Editor's Note: Shortly after this story was published, it came to our attention that the forged certificate submitted to INEC by Bola Tinubu appears to have originated from an online fake diploma design service called diploma-makers.com.

Home Create Search

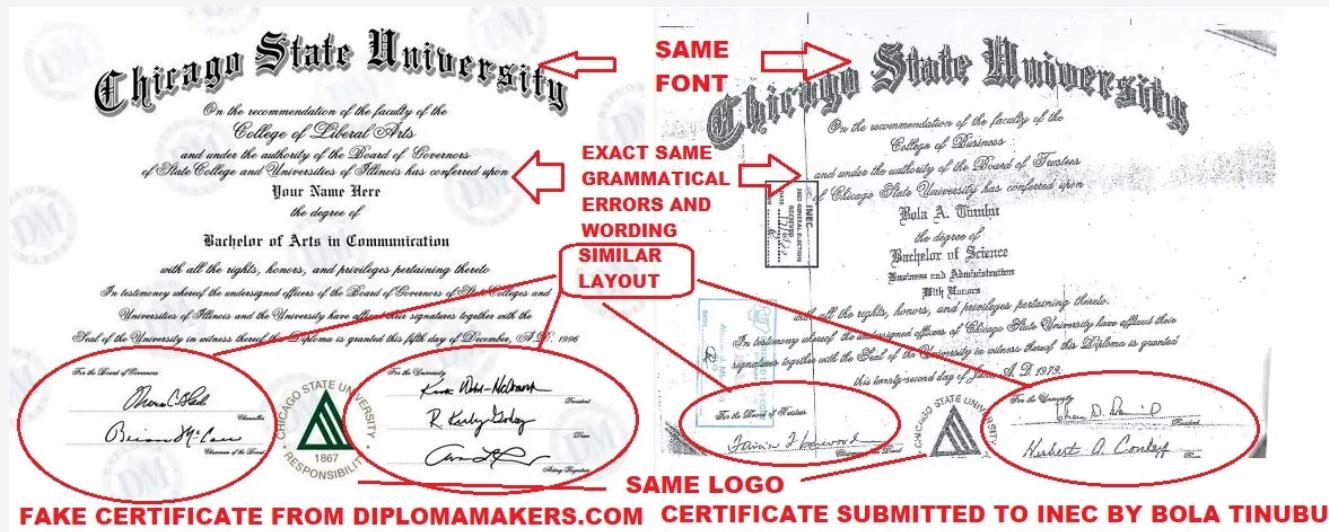
Replacement Diplomas

FAKE DIPLOMA MAKERS - With a variety of styles available, when you need transcripts, certificates, or a replacement, novelty fake diploma, shop the number one trusted online source at diplomamakers.com.

19 followers

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A search of the Diploma Makers *repository* turns up dozens of fake university and college degree certificates including a *Chicago State University certificate* that is nearly identical in design and structure to that submitted to INEC by Tinubu.



Spot the difference.

Legal Implications and Political Reactions

Under Section 29 of Nigeria's [Electoral Act, 2022](#), providing false information on Form EC9 constitutes grounds for disqualification for an election provided another contestant files a suit at the Federal High Court seeking to declare the information provided as false.

(5) Any aspirant who participated in the primaries of his political party who has reasonable grounds to believe that any information given by his political party's candidate in the affidavit or any document submitted by that candidate in relation to his constitutional requirements to contest the election is false, may file a suit at the Federal High Court against that candidate seeking a declaration that the information contained in the affidavit is false.

(6) Where the Court determines that any of the information contained in the affidavit is false only as it relates to constitutional requirements of eligibility, the Court shall issue an order disqualifying the candidate and the sponsoring political party and then declare the candidate with the second highest number of valid votes and who satisfies the constitutional requirement as the winner of the election.

While it remains unclear whether Tinubu will face any such challenge from within the APC or from presidential aspirants in other political parties, Barrister Enahoro-Ebah has chosen to file a criminal complaint against him, as provided for under Section 88 of the [Administration of Criminal Justice Act, 2015](#).

87. A court has authority to compel the attendance before it of a suspect who is within the jurisdiction and is charged with an offence committed within the State, Federation or the Federal Capital Territory, Abuja, as the case may be, or which according to law may be dealt with as if the offence had been committed within the jurisdiction and to deal with the suspect according to law.

General authority to bring suspect before a court.

88. (1) A person may make a complaint against any other person alleged to have committed or to be committing an offence.

Right of making complaint.

(2) Notwithstanding anything to the contrary contained in any other law, a police officer may make a complaint in a case of assault even though the party aggrieved declines or refuses to make a complaint.

89. (1) It is not necessary that a complaint shall be in writing, unless it is required to be so by the law on which it is founded, or by some other law, and where a complaint is not made in writing, the court or registrar shall reduce it into writing.

Form of complaint.

West Africa Weekly spoke to Festus Ogun, a Human Rights lawyer and Managing Partner at FOLEGAL, to get his perspective on what the findings mean for the 2023 presidential

elections. His comment is as follows:

"It is beyond settled, under our extant electoral jurisprudence, that giving false information, under any guise, in one's INEC FORM EC9 is a solid ground for disqualification of a candidate standing for an election in Nigeria. For the avoidance of doubt, Section 137(1)(j) of the 1999 Constitution of the Federal Republic of Nigeria, as altered, provides that "no person shall be qualified for election to the office of the President if he has presented a forged certificate to the Independent National Electoral Commission.

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In my respectful view, the material discrepancies in the authentic certificate of Asiwaju Bola Tinubu and the completely altered one, submitted to INEC by Asiwaju Tinubu, has established a clear case of certificate forgery under the Constitution and he, therefore, stands the risk of being disqualified under Section 137(1)(j) of the 1999 Constitution. That said, as a constitutional lawyer, I know that it was not the intention of the framers of the constitution that we have a Nigerian President that rides to power under the pretext of a dubiously forged certificate



Festus Ogun

That singular fact alone endangers whatever is left of our country. Those who should run for political office must meet the qualifying requirements of law. Asiwaju Tinubu should either honourably withdraw from the Presidential race for obvious case of certificate forgery or he waits till he gets disqualified by the courts either before or even after the election. The issue of disqualification, under the Constitution, can be a pre-election or post-election matter.

On a final note, let it be stated that only an aspirant that actually participated in the APC primary election and or a political party that is participating in the Presidential election can challenge Asiwaju Tinubu's forged certificate in court.”

Speaking exclusively to *West Africa Weekly*, AAC presidential candidate Omoyele Sowore excoriated Tinubu for having a “shady character” and an “opaque life.”



In his words:

"I have worked on exposing Bola Tinubu since 2008 by obtaining the drug forfeiture proceedings from the archive to which it was kept outside of Chicago, Illinois. I have also spoken extensively over his shady character regarding financial frauds in Lagos and his age falsification and opaque educational background and life in general. I do not, therefore, think for one second that Tinubu is qualified to be a Presidential candidate in 2023 or anytime for that matter."

In her reaction, Ndi Kato, Spokesperson to the Obi/Datti campaign described Tinubu's candidacy as "disheartening."



She said:

“It is absolutely disheartening that in the midst of all this, Tinubu is still framed as a formidable candidate in political discuss. From physical to mental health, education, early life etc., it is clear that Tinubu ticks no right box - not a single one. As a nation, we need to look at Tinubu as a candidate and ask ourselves if this is who we really are.”

Giving his reaction to *West Africa Weekly*, Paul Ibe, Media Adviser to PDP presidential candidate Atiku Abubakar described Tinubu as a “tainted character.”



He said:

“The allegations against Bola Tinubu, the candidate of the APC are too weighty to be glossed over. The presidency of Nigeria, a leader in the West African sub region and Africa, the most populous nation in the Black world is not deserving of a tainted character. If Tinubu still has any modicum of respect for himself and the office that he aspires to, he should do the needful.”

West Africa Weekly also spoke to Barrister Ladipo Johnson, spokesperson for NNPP presidential candidate Rabiu Musa Kwankwaso.



In his words

"I would like to believe that these allegations are untrue. However, they are so weighty and fundamental that one must let the Rule of Law come into play and take its course. Many would like to be partisan and wave the allegations away. But any citizen who truly loves Nigeria and puts the progress of Nigeria before partisanship would quietly let the rule of law take its course and either confirm or reject the allegations. It is sad that many of our politicians really do not understand or believe in DEMOCRACY. It could be a very difficult form of government that doesn't really permit "my will be done". It has its sets of rules and access to court and court proceedings are part of the principles and rules of democracy."

This story will be updated as it develops.

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227 Likes · 1 Restack

97 Comments



Write a comment...



Rock Chijioke Nov 16, 2022

Wow! Finally a legal step has been taken against this scammer, He would be a reflection of who we (Nigerians) are to the eyes of the outside world if he becomes our President. God forbid!

LIKE (16) REPLY ...



Henrietta O. Nov 16, 2022

Wonderful piece, read through it, and I am hopeful that be it before or after the election, this man can be taken down with the following documents, and that is if they allow the rule of law to take its course.

LIKE (12) REPLY ...

1 reply

95 more comments...

